

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

**MWK RECRUITING, INC.**

**Plaintiff,**

**v.**

**EVAN P. JOWERS, YULIYA  
VINOKUROVA, ALEJANDRO  
VARGAS, and LEGIS VENTURES  
(HK) COMPANY LIMITED (aka  
Jowers / Vargas),**

**Defendants.**

**Civil Action No. 1:18-cv-00444**

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**EVAN P. JOWERS**

**Counterclaimant,**

**v.**

**MWK RECRUITING, INC., ROBERT  
E. KINNEY, MICHELLE W. KINNEY,  
RECRUITING PARTNERS GP, INC.,  
KINNEY RECRUITING LLC,  
COUNSEL UNLIMITED LLC, and  
KINNEY RECRUITING LIMITED**

**Counter-defendants.**

**RESPONSE TO JOWERS'S OBJECTION TO MAGISTRATE'S ORDER**

The record and the law fully support Judge Austin's order of March 8, 2021 (Dkt. No. 265). As described in the Kinney Entities Response, the subpoena in question sought information that is not relevant to any issue in the case and was served in violation of FRCP 45. (Dkt. No. 264). For these reasons, the Judge Austin's Order should be sustained. To the extent the Court believes additional input from the Kinney

Entities may be useful, the Kinney Entities stand ready to provide an additional response.

Dated: March 23, 2021

Respectfully Submitted,

/s/ Robert E. Kinney

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**ATTORNEYS FOR PLAINTIFF MWK  
AND FOR COUNTER-DEFENDANTS  
KINNEY, RP GP, KR LLC, CU LLC,  
AND KINNEY RECRUITING HK**